

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Bankruptcy Matter of:

Peter A Renkens

Debtor

Bankruptcy No. 19-27996  
Judge A. Benjamin Goldgar (Lake)  
Chapter: 13

**OBJECTION TO CONFIRMATION**

NOW COMES Wilmington Savings Fund Society, FSB, not in its individual capacity but solely as owner trustee for Deephaven Residential Mortgage Trust 2019-1 (hereinafter “Movant”), through its attorney, Josephine J. Miceli of Johnson, Blumberg & Associates, LLC, and states as follows:

1. The above-captioned Chapter 13 case was filed on October 2, 2019.
2. The Movant, a party in interest, holds a Mortgage dated September 26, 2018 on the property located at 719 Cameron Drive, Antioch, Illinois 60002, in the original amount of \$171,500.00.
3. Movant is in the process of preparing the proof of claim to have filed by the claims bar date. The Movant’s arrearage claim is anticipated to be \$16,076.79.
4. The Debtor plan provides that the Chapter 13 Trustee is to pay the Movant \$8,000.00 for its arrearage claim. Said plan does not fully pay Movant’s actual claim and as such, the plan is unfeasible.

5. Based on the anticipated claims and the plan not being feasible, the proposed plan modifies the rights of the Movant and such modification is inconsistent with the provisions of 11 U.S.C. 1322(b)(2) and as such, the plan does not comply with the Bankruptcy Code.

WHEREFORE, Wilmington Savings Fund Society, FSB, not in its individual capacity but solely as owner trustee for Deephaven Residential Mortgage Trust 2019-1 prays that confirmation of the Debtor's plan be denied and for such other relief as the Court deems just.

/s/ Josephine J. Miceli

Josephine J. Miceli, ARDC #6243494  
Attorney for Wilmington Savings Fund Society,  
FSB, not in its individual capacity but solely as  
owner trustee for Deephaven Residential  
Mortgage Trust 2019-1

Josephine J. Miceli  
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**NOTICE:**

THIS LAW FIRM IS ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION  
OBTAINED WILL BE USED FOR THAT PURPOSE

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**NOTICE OF FILING**

TO: Peter A Renkens, 719 Cameron Drive, Antioch, IL 60002  
Glenn B Stearns, 801 Warrenville Road Suite 650, Lisle, IL 60532  
David M Siegel, David M. Siegel & Associates, 790 Chaddick Drive, Wheeling, IL 60090  
Patrick S Layng, Office of the U.S. Trustee, Region 11, 219 S Dearborn St, Room 873, Chicago, IL 60604

Please take notice on November 20, 2019, the attached Objection to Confirmation was electronically filed with the Clerk of the Bankruptcy Court for the Northern District of Illinois.

**CERTIFICATE OF SERVICE**

I, Josephine J. Miceli, an attorney certify that I served the attached Objection to Confirmation by mailing a copy to the Debtor at the address listed above by depositing the same in the U.S. mail, first class, postage prepaid at 230 W. Monroe St., Chicago, IL 60606 on or before 5:00 p.m. on November 20, 2019. The remaining parties were served by the CM/ECF electronic noticing system.

/s/ Josephine J. Miceli

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